

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
COLUMBIA DIVISION**

DUSTIN J. KITTLE,)	
)	
Plaintiff,)	
)	
v.)	NO. 1:24-cv-00025
)	
JOSEPH R. BIDEN, JR., in his)	CHIEF JUDGE CAMPBELL
official capacity as President of)	
the United States, et al.)	
)	
Defendants.)	

NOTICE OF INTENT TO PURSUE THIRD AMENDED COMPLAINT

Plaintiff Dustin J. Kittle, by and through undersigned counsel, hereby submits this Notice of Intent to Pursue Third Amended Complaint pursuant to the case management conference and in response to the Court’s most recent Order (Doc. No. 41). Plaintiff desires to inform the court and counsel for the Defendants that he intends to pursue a Third Amended Complaint – either via stipulation or a motion for leave to amend – adding claims under the Federal Tort Claims Act by December 31, 2024. Plaintiff desires to inform the Court and Defendants’ counsel of this intention in the event it affects the Defendants’ deadline to respond to the Second Amended Complaint.

DATED: November 15, 2024.

Respectfully submitted,

/s/ Ashley M. Posey

ASHLEY M. POSEY (BPR 037411)

Attorney for Plaintiff

HUMBLE LAW, LLC

2310 Santa Fe Pike

Columbia, Tennessee 38401

Telephone: (205) 358-3100

Email: ashley@humble.law

CERTIFICATE OF SERVICE

I hereby certify that on November 15, 2024, a copy of the foregoing was filed electronically. A copy will be sent to the following, if registered, by operation of the Court's electronic filing system. If not registered, a copy was sent by United States First Class Mail, postage prepaid to the following:

Kimberly S. Veirs
Assistant U.S. Attorney
United States Attorney's Office
719 Church Street, Suite 3300
Nashville, Tennessee 37203
kimberly.veirs@usdoj.gov

s/Ashley M. Posey
ASHLEY M. POSEY
Attorney for Plaintiff